

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ACCESS 4 ALL, INC., a Not-for-Profit
Corporation , and FELIX ESPOSITO,
Individually,

Plaintiffs,

v.

MASSACHUSETTS MUTUAL LIFE
INSURANCE CO., a Massachusetts
corporation,

Defendant.

Case Number:04-12240-GAO

**MOTION TO ADMIT COUNSEL PRO
HAC VICE**

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In accordance with 83.5.3(b) of the Local Rules of the United States District Court District of Massachusetts that governs the admission and practice of attorneys in said District Court, the undersigned respectfully moves for the admission of **John P. Fuller, Esquire**, 12000 Biscayne Blvd., Suite 609, North Miami, Florida 33181, (305) 891-5199, for purposes of appearing as counsel on behalf of Plaintiffs, Felix Esposito and Access 4 All, Inc., in the above-styled case.

John P. Fuller certified herewith that he has studied the Local Rules of this Court and is a member in good standing of the Florida Bar; and is admitted to the United States District Court for the Southern, Middle and Northern Districts of Florida, as well as the United States Court of Appeals for the Fifth and Eleventh Circuits. Mr. Fuller's Florida Bar Number is 0276847. There are no disciplinary proceedings against Mr. Fuller in any jurisdiction. A certificate of good standing from the Supervisor of Membership Records of the Florida Bar is attached hereto as Exhibit A. Mr. Fuller is a partner with the law firm of Fuller, Fuller & Associates, P.A. and has been a member of the Florida Bar for over twenty (20) years. An Affidavit of John P. Fuller in Support of this Motion to Admit Counsel Pro Hac Vice is attached hereto as Exhibit B.

In further support of this motion, it is hereby designated that O. Oliver Wragg is a member of the Bar of this Court. He is also a person to whom the Court and Counsel may readily communicate and upon whom papers may be served.

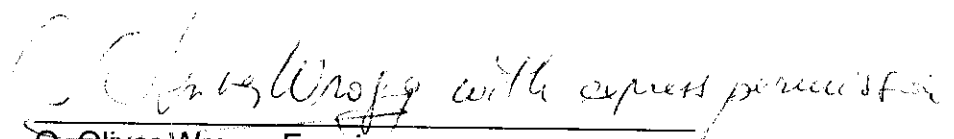
Mr. Fuller is familiar with the Local Rules of the United States District Court for the District of Massachusetts and his application for leave to practice in this court is on motion of a member of the bar of this court, who has already appeared as counsel for the Plaintiffs, Felix Esposito and Access 4 All, Inc. Additionally, Mr. Fuller has also submitted the required \$50.00 filing fee to the Clerk of the U.S. District Court.

WHEREFORE, the plaintiffs request that this Court grant John P. Fuller permission to appear before this Court pro hac vice.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for the Plaintiffs has contacted opposing counsel to obtain concurrence to the relief sought in this motion and counsel for defendant has no objection.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "O. Oliver Wragg with express permission for".

O. Oliver Wragg, Esquire
of Counsel

FULLER, FULLER AND ASSOCIATES, P.A.

(BBO#: 643152)

12000 Biscayne Blvd., Suite 609

North Miami, Florida 33181

Tel: (305) 891-5199

Fax: (305) 893-9505

I hereby certify that a true and correct copy of the foregoing has been furnished to Heather C. Krauss, Esq.; EPSTEIN, BECKER & GREEN, P.C.; 111 Huntington Avenue, 26th Floor; Boston, Massachusetts 02199 via e-mail on this 22 day of December 2004.



The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600
WWW.FLABAR.ORG

State of Florida)

County of Leon)

In Re: 276847
John Paul Fuller
Fuller Fuller & Associates, PA
12000 Biscayne Blvd., Ste. 609
North Miami, FL

C I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

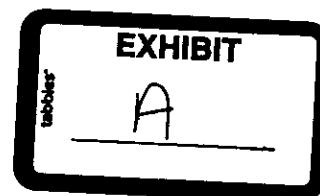
O I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on July 3, 1979.

P I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 9th day of December, 2004.

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

WMS/lpth7:R10



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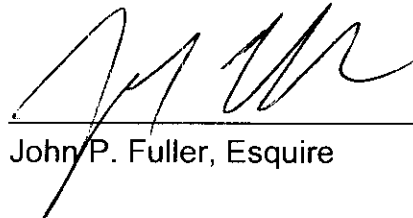
**AFFIDAVIT OF JOHN PAUL FULLER IN
SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

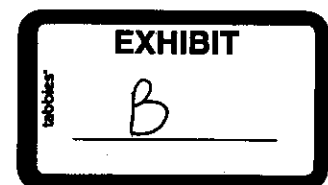
COMES NOW John P. Fuller and under oath does depose and say as follows:

1. I am a member of the bar in good standing in every jurisdiction where I am admitted to practice.
2. There are no disciplinary proceedings pending against me in any jurisdiction.
3. I am familiar with the Local Rules of the United States District Court of the District of Massachusetts.
4. I am currently actively associated with O. Oliver Wragg, Esq. who is a member of the bar of this Court.

I hereby swear upon penalty of perjury that the foregoing Declaration is true to the best of my knowledge.

Date: 12/17/04

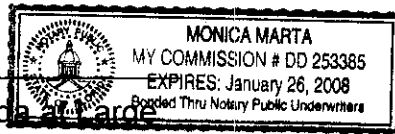

John P. Fuller, Esquire



STATE OF FLORIDA
COUNTY OF Miami - Dade

Sworn to (or affirmed) and subscribed before me this 15th day of December, 2004, by
John P. Fuller

[Signature]
NOTARY PUBLIC, State of Florida at Large



Personally Known ✓ OR Produced Identification _____
Type of Identification Produced _____